NORTH SLOPE BOROUGH SCHOOL DISTRICT

Nunamiut Wolves Amaġut
Nunamiut School
P.O. Box 21029
Anaktuvuk Pass, Alaska 99721
(907) 661-3226
FAX (907) 661-6215

Atqasuk Eagles Tiŋmiaqpait/ch
Meade River School
P.O. Box 91030
Atqasuk, Alaska 99791
(907) 633-6315
FAX (907) 633-6215

Barrow Whalers Aġviqsiuqtit
Barrow High School
P.O. Box 960
Barrow, Alaska 99723
(907) 852-8950
FAX (907) 852-8969

HMS Wolves Amaġut
Eben Hopson, Sr., Memorial Middle
School
P.O. Box 509
Barrow, Alaska 99723
(907) 852-3880
FAX (907) 852-7794

Arctic Foxes Tiġiganniat
Fred Ipalook Elementary School
P.O. Box 450
Barrow, Alaska 99723
(907) 852-4711
FAX (907) 852-4713

Kiita Snowy Owls Ukpiit/ch
Kiita Learning Community
P.O. Box 169
Barrow, Alaska 99723
(907) 852-9677
FAX (907) 852-4334

Kaveolook Rams Imnait/ch
Harold Kaveolook School
P.O. Box 20
Kaktovik, Alaska 99747
(907) 640-6626
FAX (907) 640-6718

Nuiqsut Trappers Naniġiaqtuqtit
Trapper School
P.O. Box 89167
Nuiqsut, Alaska 99789
(907) 480-6712
FAX (907) 480-6621

Tikiġaq Harpooners Kapuqtit
Tikigaq School
P.O. Box 148
Point Hope, Alaska 99766
(907) 368-2662/2663
FAX (907) 368-2770

Kali Qavviit/ch
Kali School
P.O. Box 59077
Point Lay, Alaska 99759
(907) 833-2311
FAX (907) 833-2315

Alak Huskies Qimuktit
Alak School
P.O. Box 10
Wainwright, Alaska 99782
(907) 763-2541
FAX (907) 763-2565

April 7, 2014

North Slope Borough School District
P.O. Box 169
Barrow, AK 999723

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Sir/Madame,

I am writing today in response to the FCC's Public Notice (PN): Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization which, among other things, examines how to distribute $2 billion in found funding for the E-Rate program. The E-Rate program currently represents the only source of federal funding aimed at educational technology and it critical in providing discounts to assist schools (like mine) to obtain affordable telecommunications and Internet access.

The North Slope Borough School District is located 750 air miles north of Anchorage, Alaska and serves 11 sites. Four of these sites are located in Barrow, AK and seven of these sites are located in remote Eskimo (Iñupiat) villages. The North Slope Borough School District is not located on the road system and the primary means of transportation between the villages are by air, boat, snowmobile, and the ice road where permissible during winter months. With a student population of over 2,000, with 49% meeting NSLP eligibility, receiving adequate-E-rate funding is a necessity to provide instructional resources to the North Slope Borough School District and each of its sites.

As the FCC moves forward with this PN, we urge you to ensure that changes to modernize the program are focused on expanding a successful program that has yet to reach its full potential. E-Rate has served as the cornerstone to the rapid and dramatic expansion of school and library connectivity. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step the FCC can take to bolster E-Rates current and future success is to provide $5 billion in funding, an amount commensurate with current demand. The final proposal must include both programmatic restructuring and a permanent increase in the program's funding cap. Quite simply, an infusion of funding without programmatic restructuring is a poor investment, and programmatic restructuring without permanent, adequate funding sets the program on a path towards instability and failure.

Box 169   Barrow, Alaska 99723   (907) 852-5311   Fax (907) 852-9503

The $2 billion (over two years) in found funding for E-Rate is a strong step in the right direction, as is focusing the funds on Priority Two (internal connections). Connectivity is an annual expense, though, and I am concerned that the proper focus on modernization and build out will come with sustained increased program demand that far exceeds the current program funding level and the inevitable funding cliff that will come when the $2 billion is spent down. In fact, the most recent application cycle for E-Rate (closing March 26, 2014) totaled more than $2.225 billion for one year, already exceeding the $2 billion the FCC proposes for two years.

It is my hope that the final changes to the E-Rate program position to program to continue to fulfill its original promise of connectivity in the broader context of equity, local decision making, and technological neutrality. More specifically to the FCC's proposal:

- Support technological neutrality: Technological neutrality (allowing a variety of technologies as opposed to prescribing a limited number) and local decision-making is an efficiency: Local school system and library leaders are best positioned to know their respective technological needs, the process for implementing the technology plan, and the related costs. Tech neutrality and local decision making empower districts like mine to maximize the benefit of E-Rate dollars, for connections both *to* and *within* schools and libraries.

- Oppose any effort to set aside a specific portion of E-Rate dollars for Priority Two: The concept of a carve out/set aside for Priority Two sets up the very real threat of 'robbing Peter to pay Paul', whereby the set aside for Priority Two would encroach on Priority One, leaving both priorities to be rationed.

- Oppose any proposal that would distribute E-Rate funding on the basis of a per-capita (ie, per-student) basis: Beyond an inability to recognize high-cost service factors that often impact remote, rural and small schools, a per-capita approach is a step away from E-Rate's historical focus on equity. As both AASA and AESA wrote in their comments, "Concentration of poverty is reflected in the percentage of eligibility, as opposed to a straight count of students in poverty. That is, 100 low-income students in a district of 1,000 students is a different level of poverty than 100 low-income students in a district of 10,000. Specific to the idea of a per pupil cap: With a historic focus on concentrations of poverty, the very act of diluting funding to a pupil (or class, or building) level is antithetical to combating concentrations of poverty. It reflects the presence, but not necessarily the concentration, of poverty. Per capita limits are poor proxies for ensuring that funds remain targeted on the neediest populations."

- Support Streamlining Administrative Process: Streamlining of the administrative process including online filing and reduced administrative burden[1], as well as allowing

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[1] See AASA/AESA Joint Filing, Aug 27, 2013
http://aasa.org/uploadedFiles/Policy_and_Advocacy/files/AASA%20E-Rate%20NPRM%20Comments%20081613.pdf

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for multi-year applications and providing an 'EZ' renewal form for applicants making no changes to a previous year's application.

- Support Voice Services: Voice remains an important E-Rate service for schools and libraries. Removing voice services from the eligible services list does not negate my district's very real need for working phones, for everything from simple contact to emergency communication. The shift would translate into increased fiscal pressure on my district's budget.
- Oppose demonstration projects within E-Rate funding: Any of the pilot projects siphon limited dollars away from the historically oversubscribed E-Rate program. Any incursion on the E-rate program – whether it be from a new service, a new class of applicants, or a new program (as the proposed pilot would be) – would significantly destabilize the program.

The North Slope Borough School District relies heavily on E-rate funds to provide the "Severely Restricted Capacity" connectivity needed to ensure that all students receive the resources necessary to achieve their learning potential. To continue to meet the growing needs of the district, E-rate must develop a low cost, long-term plan that will allow rural schools and libraries access to high-capacity bandwidth. Removing funds from the Priority One services pool to fund Priority Two services will simply translate into less Priority One funding for remote rural school districts such as the North Slope Borough School District that rely heavily on Priority One E-rate funding. Maintaining Priority One funding is an issue of equity.

Testing bandwidth limitations/inequities: To provide for a national comparison, utilizing the Partnership for Assessment of Readiness for College and Careers (PARCC) tool, "Assessment Capacity Planning Tool," seven out of eight communities would take 20 days to complete the end-of-year assessment utilizing two test sessions per day. One community would take 10 days. Furthermore, this would require administering the assessments using caching. In seven of the communities, if one student per school was "browsing" or "emailing" there would be a gap between bandwidth requirement and available bandwidth. To put this into perspective, based on the PARCC tool, seven schools would need to go one month with no available bandwidth during the school day, for any purpose except for testing.

Based on the 2012 "Ohio's K-12 Network Upgrade Analysis,[2]" 6% of Ohio schools are classified as Severely Restricted; 100% of the schools in the North Slope Borough School District would be classified as having "Severely Restricted Capacity" of less than 10Mbps per school. The total daily cost per student in Ohio was $0.37 compared to $5.94 per student cost in the NSBSD for FY15. The cost per student is 16 times more in the NSBSD compared to Ohio Schools – the cost per Mbps is 3071 times
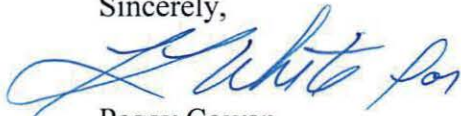
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[2] http://www.mcoecn.org/wp-content/uploads/2012/06/ODLTF-30812-FINAL.pdf

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more expensive in the NSBSD compared to Ohio Schools. Thus, there is neither equity in access nor equity in price for the North Slope students compared to Ohio students.

However, while maintaining adequate Priority One funding, it is equally as important for E-rate to provide funding for Priority Two services. Schools and libraries must have the infrastructure in place to take full advantage of the high-capacity bandwidth that should be made available through E-rate funding. Using antiquated infrastructures to provide high-capacity bandwidth is not cost efficient and it robs the network of valuable bandwidth. However, this should not be achieved by removing Priority One funds to fund Priority Two services. Developing a long term, sustainable plan and pairing it with an increase in the available E-rate funds to $5 billion can achieve this.

Thank you for considering my response as you move forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved.

Sincerely,

Peggy Cowan
Superintendent, North Slope Borough School District

Box 169   Barrow, Alaska 99723   (907) 852-5311   Fax (907) 852-9503